

Adam Sullivan
Name
322077
Prison Number
Goose Creek Correctional Center
Place of confinement
22301 West Alsop Road
Mailing address
Wasilla, AK 99654
City, State, Zip

Telephone

RECEIVED
2021 SEP 27 00:05:21
CLERK, U.S. DISTRICT COURT
ANCHORAGE, AK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

Adam Sullivan,
(Enter full name of plaintiff in this action)

Plaintiff,

vs.

Case No. 3:21-cv-00220-RRB
(To be supplied by Court)

Erin Maiston, Ana Cometa,
Lawrence Monsma, Brittany Dunlop,
Charles Asarter, John Kwak, Det. Foster,
(Enter full names of defendant(s) in this action.
Do NOT use *et al.*)

Defendant(s).

PRISONER'S
COMPLAINT UNDER
THE CIVIL RIGHTS ACT
42 U.S.C. § 1983

A. Jurisdiction

Jurisdiction is invoked under 28 U.S.C. § 1343(a)(3).

B. Parties

1. Plaintiff: This complaint alleges that the civil rights of Adam Sullivan,
(print your name)
Goose Creek Correctional Center
who presently resides at 22301 West Alsop Rd,
(mailing address or place of confinement)
were violated by the actions of the individual(s) named below.

2. Defendants (Make a copy of this page and provide same information if you are naming more than 3 defendants):

Defendant No. 1, Eein Marston is a citizen of Alaska, and is employed as a Superior Court Judge.
(name) (state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☒ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 2, Ana Cometa is a citizen of Alaska, and is employed as a District Attorney.
(name) (state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☒ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 3, Lawrence Monsma is a citizen of Alaska, and is employed as a District Attorney.
(name) (state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☒ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

*****REMINDER*****

**You must exhaust your administrative remedies before your claim can go forward.
THE COURT MAY DISMISS ANY UNEXHAUSTED CLAIMS.**

C. Causes of Action (You may attach additional pages alleging other causes of action and facts supporting them if necessary. Make copies of page 5 and rename them pages 5A, 5B, etc. and rename the claims, "Claim 4," "Claim 5, etc.").

2. Defendants (Make a copy of this page and provide same information if you are naming more than 3 defendants):

Defendant No. 4, Brittany Dunlop is a citizen of Alaska, and is employed as a District Attorney.
(name) (state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 5, Charles Agerter is a citizen of Alaska, and is employed as a District Attorney.
(name) (state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 6, John Novak is a citizen of Alaska, and is employed as a District Attorney.
(name) (state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

REMINDER

You must exhaust your administrative remedies before your claim can go forward.
THE COURT MAY DISMISS ANY UNEXHAUSTED CLAIMS.

C. Causes of Action (You may attach additional pages alleging other causes of action and facts supporting them if necessary. Make copies of page 5 and rename them pages 5A, 5B, etc. and rename the claims, "Claim 4," "Claim 5, etc.").

2. **Defendants** (Make a copy of this page and provide same information if you are naming more than 3 defendants):

Defendant No. 1, Mr. Forekar is a citizen of Alaska, and is employed as a APD Detective.
(name) (state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 2, Lisa Wilson is a citizen of Alaska, and is employed as a Alaska Office of Public Advocacy.
(name) (state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 3, Taylor Winston is a citizen of Alaska, and is employed as a Alaska Office of Victim's Rights.
(name) (state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

REMINDER

You must exhaust your administrative remedies before your claim can go forward.
THE COURT MAY DISMISS ANY UNEXHAUSTED CLAIMS.

C. Causes of Action (You may attach additional pages alleging other causes of action and facts supporting them if necessary. Make copies of page 5 and rename them pages 5A, 5B, etc. and rename the claims, "Claim 4," "Claim 5, etc.").

*1

Claim 3: On or about 2018 Through Present, my civil right to

Due Process; Speedy Public Fair Trial;

(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List only one violation.)

was violated by ERIN MORSON, Superior Court Judge.

(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 3. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 3.):

Judge ERIN MORSON, after taking an oath to uphold the Constitutions and Laws of the United States and Alaska, with Deliberate intent has failed to maintain and uphold such Constitutional Rights and follow the laws of the United States and Alaska. Clearly on the Record of the Proceedings before Judge Morson, in the Alaska Superior Court such actions intentionally deprived me of State Statutory and Constitutional Rights and at that point all Immunity of which Judge Morson did enjoy was stripped upon the Criminal Act of a Violation of Alaska Statute 11.76.110 "Interference with Constitutional Rights".

^{#2}
Claim 3: On or about August 17, 2019 Through Present, my civil right to
Due Process ("Deversant Claim") (Date)

(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List only one violation.)

was violated by Ana Cometa

(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 3. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 3.):

After taking an Oath of Office to uphold the Constitution and laws of the United States and Alaska, Ms. Cometa Deliberately lied to the Court (Alaska Superior Court, Judge Erin Morrison), with holding Evidence not only from the Attorney of Record for my Criminal Defense but from the Grand Jury Proceeding. That Evidence is and was Exculpatory and intentionally withheld in pursuit of the Criminal Charges. Clear Evidence and Statements from known witnesses Establishing a Self-Defense Position in a Felony matter.

Ms. Cometa lost any Immunity enjoyed from her Office upon her Crime of Intentional Interference with Constitutional Rights (A.S. § 11.66.110)

Claim 3: On or about February 17th, 2017 Through Present, my civil right to Due Process (Deference Claim). (Date)

(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List only one violation.)

was violated by Lawrence Monsma

(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 3. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 3.):

Lawrence Monsma, with intention to cause injury did withhold Evidence in a Criminal Proceeding, Lied in Court after having Entered his Oath as a Prosecuting attorney to uphold and Defend the Constitutional Laws of the United States and the State of Alaska. To which he knew of Witness Statements and Evidence to which the Clear Defense of Self Defense would be available, Lied to the Court (State Superior Court), hid the Discovery of Such Witness Statements, failed to present to a Grand Jury Such Exculpatory Evidence and caused injury to the Plaintiff, including Mental Anguish and Stress.

Mr. Monsma lost all immunity he had enjoyed from his Office as a Prosecutor when he committed the Crime of intentional Interference with Constitutional Rights (A.S. § 11.76.110).

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Claim 3: On or about January 20th 2020 through Present, my civil right to Due Process (Devereaux Claim) (Date)

(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List only one violation.)

was violated by Brittany Dunlop

(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 3. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 3.):

As a Prosecuting Attorney, Ms. Dunlop took an Oath of Office to Uphold and Protect the Constitution and laws of the United States and the State of Alaska. Thereafter Ms. Dunlop lied to the Court, withheld Evidence in a Criminal Proceeding to which the Self Defense Pleading could have and is established through statements of witnesses, withheld such from both Defense and the Grand Jury (Exculpatory Evidence).

Ms. Dunlop upon committing the Crime of Interference with Constitutional Rights (Cal. § 14.76.110) lost all immunity.

#5

Claim 3: On or about January 20th 2020 Through Present, my civil right to
Due Process (Deveraux Claim) (Nagae Violation) (Date)
(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List only one violation.)

was violated by Charles Agerter
(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 3. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 3.):

After taking an Oath of Office to Uphold and Defend the
Constitutional Laws of the United States and the
State of Alaska, he intentionally lied in a State Criminal
Court as to the Witness Statements that clearly establish
the availability of a Self Defense Position in a Felony
Criminal Matter.

Mr. Agerter lost his immunity he enjoyed from his
office when he committed the Crime of Interference
with Constitutional Rights (as § 11.78.110).

#6

Claim 3: On or about February 20th 2020 through Present, my civil right to

Due Process (Devereaux Claim); (Nagae Violation)

(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List only one violation.)

was violated by John Novak

(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 3. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 3.):

Mr. Novak, after having taken an oath to uphold the Constitution and laws of the United States and the State of Alaska, intentionally lied in Criminal Proceedings, withheld Exculpatory Evidence of Witness Statements that clearly establish a Defense Position of Self Defense, lied when cross examined and failed to correct such False Statements.

Mr. Novak lost all his Immunity he enjoyed upon his committing the Crime of Interference with Constitutional Rights (AS 11.76.110)

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Claim 3: On or about February 19th 2017 through Present, my civil right to

Due Process (Deliberate Fabrication of Evidence)

(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List only one violation.)

was violated by Detective Foraker - Anchorage Police Department
(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 3. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 3.):

Mr. Foraker intentionally failed to gather evidence and statements of witnesses in a timely manner, allowed evidence to go unpreserved that tend to support the criminal defense position of self-defense in a felony criminal case and presented lies to a criminal court in the attempt to hide evidence in criminal case.

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Claim 3: On or about February 17th 2017 through Present, my civil right to

STATE TORT Claim of Slander, Defamation of Character

(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List only one violation.)

was violated by Lisa Wilson

(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 3. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 3.):

Ms. Wilson has told my Children that I Murdered their Mother in Cold Blood when in fact, My Children do have and are Witnesses of My Actions of Self Defense. Ms. Wilson has lied to my Daughters in her attempt to Alter and Change my Daughters Future Testimony. This has been witnessed by others.

Ms. Wilson Committed the State Crime of interference with Constitutional Rights (11.76.110) and lost any immunity upon that act.

#9

Claim 3: On or about February 17th 2017 Through Present, my civil right to

STATE TORT Claim of Slander, Defamation of Character

(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List only one violation.)

was violated by

Taylor Winston

(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 3. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 3.):

Ms. Winston has told my children I murdered their Mother in Cold Blood. I have not been convicted and the lies Ms. Winston are attempts to change the future testimony of my children who witnessed the facts my actions were in self defense and thus not guilty of Cold Blooded Murder. Witnesses have observed the statements and the attempts to change the statements of the witnesses (my daughters) as to my acts of self defense.

(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List only one violation.)

Supporting Facts (Briefly describe facts you consider important to Claim 3. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 3.):

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There are approximately 20 lines visible. The paper appears to be a standard notebook page.

D. Previous Lawsuits

1. Have you begun other lawsuits in **state or federal court** dealing with the **same facts** involved in this action, **or otherwise relating to your imprisonment**? _____ Yes X No

2. If your answer is "Yes," describe each lawsuit.

a. Lawsuit 1:

Plaintiff(s): _____

Defendant(s): _____

Name and location of court: _____

Docket number: _____ Name of judge: _____

Approximate date case was filed: _____ Date of final decision: _____

Disposition: _____ Dismissed _____ Appealed _____ Still pending

Issues Raised: _____

b. Lawsuit 2:

Plaintiff(s): _____

Defendant(s): _____

Name and location of court: _____

Docket number: _____ Name of judge: _____

Approximate date case was filed: _____ Date of final decision: _____

Disposition: _____ Dismissed _____ Appealed _____ Still pending

Issues Raised: _____

3. Have you filed an action in federal court that was dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted?

_____ Yes X No

If your answer is "Yes," describe each lawsuit on the next page.

Lawsuit #1 dismissed as frivolous, malicious, or failed to state a claim:

- a. Defendant(s): _____
- b. Name of federal court _____ Case number: _____
- c. The case was dismissed as: ___ frivolous, ___ malicious and/or ___ failed to state a claim
- d. Issue(s) raised: _____
- e. Approximate date case was filed: _____ Date of final decision: _____

Lawsuit #2 dismissed as frivolous, malicious, or failed to state a claim:

- a. Defendant(s): _____
- b. Name of federal court _____ Case number: _____
- c. The case was dismissed as: ___ frivolous, ___ malicious and/or ___ failed to state a claim
- d. Issue(s) raised: _____
- e. Approximate date case was filed: _____ Date of final decision: _____

Lawsuit #3 dismissed as frivolous, malicious, or failed to state a claim:

- a. Defendant(s): _____
- b. Name of federal court _____ Case number: _____
- c. The case was dismissed as: ___ frivolous, ___ malicious and/or ___ failed to state a claim
- d. Issue(s) raised: _____
- e. Approximate date case was filed: _____ Date of final decision: _____

4. Are you in imminent danger of serious physical injury? ___ Yes X No

If your answer is "Yes," please describe how you are in danger, without legal argument/authority: _____

F. Request for Relief

Plaintiff requests that this Court grant the following relief:

1. Damages in the amount of \$ ~~100,000,000.00~~ ^{In Excess of Seventy Five Thousand Dollars} ~~with the TRUE Amount to be Proved at Trial. (\$75,000)~~
2. Punitive damages in the amount of \$ ~~100,000,000.00~~ ^{In Excess of \$75,000} ~~with the TRUE Amount to be proved at Trial.~~
3. An order requiring defendant(s) to pay in full and court costs.
4. A declaration that Mr Rights have been Violated and Any Reasonable Order the Court Deems Just.
5. Other: will put liens on bank accounts / homes / propertys

Plaintiff demands a trial by jury. ☒ Yes ☐ No

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that s/he is the plaintiff in the above action, that s/he has read the above civil rights complaint and that the information contained in the complaint is true and correct.

Executed at Goose Creek Correctional on 9-23-21
(Location) (Date)

[Signature]
(Plaintiff's Signature)

Original Signature of Attorney (if any)

(Date)

Attorney's Address and Telephone Number

Adom Sullivan 322277
Crest Creek Correctional Center
22301 West Alsop Rd.
Wasilla, AK 99654

U.S. District Court

222 W. 7th Avenue, Room 229, Box 5, Ste #4

Anchorage, AK 99513

